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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In re:

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

20 **Debtors.**
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Bankruptcy Case No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**DECLARATION OF HEATHER M. LAWS
IN SUPPORT OF MOTION OF WESTERN
ELECTRICITY COORDINATING
COUNCIL TO FILE PROOFS OF CLAIM
AND ANY AMENDMENTS THERETO
UNDER SEAL**

- 22 ☐ Affects PG&E Corporation
23 ☒ Affects Pacific Gas and Electric Company
24 ☐ Affects both Debtors

25 ** All papers shall be filed in the Lead*
26 *Case, No. 19-30088 (DM)*
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[No Hearing Requested]

DECLARATION OF HEATHER M. LAWS

I, Heather M. Laws, declare as follows:

1. I am the Director of Enforcement for Western Electricity Coordinating Council (“WECC”). In my capacity as such, I manage and oversee the fulfillment of WECC’s responsibilities as the regional entity with respect to the operations of Pacific Gas and Electric Company (the “Debtor”). I make this declaration in support of the Motion of Western Electricity Coordinating Council to File Proofs of Claim and any Amendments Thereto Under Seal, which has been contemporaneously filed herewith.

2. As a result of my role and tenure with WECC, I am familiar with the underlying claims of WECC against the Debtor. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, could testify competently thereto. Except as otherwise stated, all facts set forth in this declaration are based on my personal knowledge, my review of relevant documents of WECC, as those documents pertain to the Debtor.

3. WECC is a not-for-profit corporation responsible for mitigating risks to the reliability and security of critical portions of the electrical power grid for the geographic area known as the Western Interconnection, which is a 1.8 million square mile area that spans from western Canada to northern Baja California, Mexico. Geographically, WECC is the largest and most diverse of the six regional entities that have delegated authority from the North American Electric Reliability Corporation (“NERC”) and Federal Energy Regulatory Commission (“FERC”) to monitor and enforce mandatory reliability standards for the Bulk Electric System and to serve as the Regional Entity within United States portion of the Western Interconnection.

4. WECC’s claims against the Debtor pertain to its role serving as the Regional Entity with jurisdiction over the Debtor’s operations. WECC is authorized by the delegation of its authority from NERC and FERC to issue notices of alleged violations to the Debtor and proposed penalties resulting from those violations. In some instances, the violations are self-reported by the Debtor to WECC, and in other instances WECC has discovered violations through its own independent investigation and audit of the Debtor’s operations. Violations identified by WECC cannot be made public, because if the violations were made public, then a “bad actor” could

1 potentially discover by reviewing WECC's proof of claim weaknesses in the Debtor's physical
2 security measures protecting critical energy infrastructure, or flaws in the Debtor's cybersecurity
3 procedures. It thus critical both for the protection of the public and to ensure the reliable
4 transmission of energy to consumers that WECC's proof of claim be filed under seal.

5 5. WECC intends to file claims in the Debtor's bankruptcy case, which claims include
6 highly sensitive Confidential Information, Critical Energy Infrastructure Information, and Cyber
7 Security Incident Information, all as defined in the Rules of Procedure (the "RoP") promulgated
8 by NERC. Violations WECC alleges to have been committed by the Debtor cannot be publicly
9 attributed to the Debtor because such public disclosure could lead to a circumstance in which one
10 or more "bad actors" would be able to identify and target weaknesses in the Debtor's physical
11 security measures protecting critical energy infrastructure, or flaws in the Debtor's cybersecurity
12 procedures.

13 6. Even the amounts of WECC's claims against the Debtor could reveal such
14 Confidential Information, Critical Energy Infrastructure Information, and Cyber Security Incident
15 Information. If the claim amounts submitted by WECC were made public, they could potentially
16 be used by a "bad actor" to identify specific violations committed by the Debtor, which would
17 thus reveal Confidential Information, Critical Energy Infrastructure Information, and Cyber
18 Security Incident Information. Although the violations asserted by WECC against an entity such
19 as the Debtor are public information, including the nature of the violations asserted and the
20 associated penalty amounts, the actual identity of the entity that committed the violation is not
21 made public in order to protect Confidential Information, Critical Energy Infrastructure
22 Information, and Cyber Security Incident Information.

23 6. As a consequence, it is critical both for the protection of the public and to ensure
24 the reliable transmission of energy to consumers that WECC's proofs of claim against the Debtor,
25 and any amendments thereto, be filed under protection of seal.


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I declare under penalty of perjury that the foregoing is true and correct. Executed on this
10th day of October 2019, at Salt Lake City, Utah.


Heather M. Laws